

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2023 JAN 19 PM 1:04

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NATHAN RUDOLPH and  
KEITH SHOOK,

Defendants.

CASE NO. 23-15

JUDGE Marbey

INDICTMENT

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)

21 U.S.C. § 841(a)(1), (b)(1)(C)

21 U.S.C. § 846

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

COUNT ONE

(Felon in Possession of a Firearm)

On or about July 6, 2022, in the Southern District of Ohio, the defendant, **NATHAN RUDOLPH**, knowing at that time that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in or affecting interstate commerce, a firearm, specifically, a Romarms Draco-c, 7.62 pistol, serial number unknown, and ammunition.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).

COUNT TWO

(Felon in Possession of a Firearm)

On or about July 6, 2022, in the Southern District of Ohio, the defendant, **KEITH SHOOK**, knowing at that time that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in or affecting interstate commerce, firearms, specifically, a Taurus G2C, 9mm pistol, serial number TLP37200 and

ammunition; an Anderson Manufacturing AM-15, multi-caliber pistol, serial number 16138579 and ammunition; a Taurus Spectrum, .380 caliber pistol, serial number 1F182132; and a Taurus PT738, .380 caliber pistol, serial number 23049C.

**In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).**

**COUNT THREE**

**(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl and Cocaine)**

Beginning in or about May 2022, and continuing to on or about July 6, 2022, in the Southern District of Ohio, the defendants, **NATHAN RUDOLPH** and **KEITH SHOOK**, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with other individuals, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as fentanyl, and cocaine, both Schedule II controlled substances.

**In violation of 21 U.S.C. §§ 846, 841(a)(1), and 841(b)(1)(C).**

**FORFEITURE A**

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of any offense alleged in the Indictment, the defendant, **NATHAN RUDOLPH**, shall forfeit to the United States all firearms and ammunition involved in or used in such offense, including, but not limited to, a Romarm Draco-c, 7.62 pistol, bearing no serial number, including all magazines and ammunition.

**Forfeiture notice in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.**

**FORFEITURE B**

3. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

4. Upon conviction of any offense alleged in the Indictment, the defendant, **KEITH SHOOK**, shall forfeit to the United States all firearms and ammunition involved in or used in such offense, including, but not limited to, the following:

- A Taurus G2c, 9mm pistol, bearing Serial Number TLP37200, including all magazines and ammunition;
- An Anderson Manufacturing AM-15, pistol, bearing Serial Number 16138579, including all magazines and ammunition;
- A Taurus Spectrum, .380 caliber pistol, bearing Serial Number 1F182132, including any ammunition; and
- A Taurus PT738, .380 caliber pistol, bearing Serial Number 23049C, including any ammunition.

**Forfeiture notice in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.**

**FORFEITURE C**

5. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to 21 U.S.C. § 853(a)(1) and (2).

6. Upon conviction of the offense in violation of 21 U.S.C. § 846 as alleged in Count Three of this Indictment, the defendants, **NATHAN RUDOLPH** and **KEITH SHOOK**, shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), any property

constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including, but not limited to, the following property seized from 6640 Centennial Drive, Reynoldsburg, Ohio during the investigation in this case:

- Approximately \$13,405.00 in United States currency;
- A Romarms Draco-c, 7.62 pistol, serial number unknown, including all magazines and ammunition;
- A Taurus G2c, 9mm pistol, bearing Serial Number TLP37200, including all magazines and ammunition;
- An Anderson Manufacturing AM-15, pistol, bearing Serial Number 16138579, including all magazines and ammunition;
- A Taurus Spectrum, .380 caliber pistol, bearing Serial Number 1F182132, including any ammunition; and
- A Taurus PT738, .380 caliber pistol, bearing Serial Number 23049C, including any ammunition.

**Forfeiture notice in accordance with 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.**

**A TRUE BILL.**

*s/Foreperson*

**FOREPERSON**

**KENNETH L. PARKER**  
**United States Attorney**

  
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**NICOLE PAKIZ**  
**Assistant United States Attorney**